

REMARKS

This paper is filed in response to the Office Action mailed March 30, 2010.

Claims 1-25 are pending in this application. Claims 23-25 were rejected under 35 U.S.C. § 101 as allegedly being directed to unpatentable subject matter. Claims 12-22 were rejected under 35 U.S.C. § 102(e) to U.S. Patent No. 6,954,899 to Anderson (“Anderson”). Claims 1-11 and 23-25 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,819,312 to Fish (“Fish”) in view of U.S. Patent No. 6,084,587 to Tarr et al (“Tarr”) and further in view of Anderson.

Applicant has amended claims 1, 16, and 23. No new matter is added by these amendments, and support may be found in the specification and claims as originally filed.

Applicant traverses each of the Examiner’s rejections and respectfully requests reconsideration and allowance of all claims in view of the remarks below.

I. § 101 – Claims 23-25

Applicant respectfully traverses the rejection of claims 23-25 under 35 U.S.C. § 101 as allegedly being directed to unpatentable subject matter. To the extent the term “computer-readable medium” is defined to include “transitory” media, as the term “transitory” is used in In re Nuijten,¹ Applicant hereby expressly disclaims all “transitory” computer-readable media from the scope of the term “computer-readable medium” as defined in the present application. In view of the foregoing, claims 23-25 are directed only to patentable subject matter. Applicant respectfully requests the Examiner withdraw the rejection of claims 23-25.

II. § 102(e) – Anderson – Claims 12-22

Applicant respectfully traverses the rejection of claims 12-22 under 35 U.S.C. § 102(e) as allegedly being anticipated by Anderson.

To anticipate a claim under 35 U.S.C. § 102(e), a reference must disclose each and every element of the claimed invention.²

Because Anderson does not disclose “wherein: each channel is a substantially one-dimensional channel, the first primary channel intersects the second primary channel, the first

¹ 500 F.3d 1346 (Fed. Cir. 2007).

² M.P.E.P. § 2131.

secondary channel intersects one of the first or second primary channel, and the second secondary channel intersects one of the first or second primary channels or the first secondary channel” as recited in amended claim 16, amended claim 16 is patentable over Anderson. As described in the previous response, Anderson does not disclose such channels or such a configuration. Rather, Anderson discloses using haptic effects to indicate boundaries of a control region, where the control region is a line (1-D), a rectangle (2-D), or a box (3-D). However, these control regions do not define a plurality of channels. The 2-D “control zone” described by Anderson describes a region surrounded by haptic borders, not multiple channels along different axes. Similarly, the 3-D “control zone” describes a volume surrounded by haptic borders, but not multiple channels along different axes. Finally, while Anderson generally describes a 1-D channel, it does not disclose a configuration of multiple channels as recited in claim 16. Thus, Anderson does not anticipate claim 16. Applicant respectfully requests the Examiner withdraw the rejection of claim 16.

Because claims 12-15 and 17-22 depend from and further limit claim 16, claims 12-15 and 17-22 are each patentable over Anderson. Applicant respectfully requests the Examiner withdraw the rejection of claims 12-15 and 17-22.

III. § 103(a) – Fish in view of Tarr and Anderson – Claims 1-11 and 23-25

Applicant respectfully traverses the rejection of claims 1-11 and 23-25 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Fish in view of Tarr and Anderson.

To establish *prima facie* obviousness of a claimed invention under 35 U.S.C. § 103, the Office Action must show, either from the references themselves or in the knowledge generally available to one of ordinary skill in the art, that the cited references disclose or suggest each claimed element.³

Because Fish in view of Tarr and Anderson does not disclose or suggest “defining a graphical user interface having a plurality of graphical input elements arranged in a matrix configuration; defining a first cell, the first cell comprising a first parameter representing a first haptic effect; assigning the first cell to a first graphical input element in the matrix configuration; assigning the first cell to a second graphical input element in the matrix configuration [and] outputting the first haptic effect based at least in part on the first parameter and the position, the

³ See *Graham v. John Deere Co.*, 383 U.S. 1 (1966); See also *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398 (2007).

haptic effect configured to either resist or assist the movement of the user manipulatable object” as recited in amended claims 1 and 23, amended claims 1 and 23 are patentable over the combined references. The combined references do not disclose arranging a plurality of graphical input elements in a matrix and generating haptic effects to assist or resist the movement of the user manipulatable object based on such graphical input elements. Fish discloses “haptels,” small, individual haptic elements; however, these are not graphical input elements arranged in a matrix configuration. Nor does Fish disclose assigning a first cell to a first and second graphical input element. And while Tarr discloses assigning haptic parameters to virtual objects, it does not disclose defining a graphical user interface having a plurality of graphical input elements arranged in a matrix configuration, assigning a first cell to a first and second graphical input element, or outputting a haptic effects to resist or assist the movement of a user manipulatable object. Finally, Anderson does not disclose defining a graphical user interface having a plurality of graphical input elements arranged in a matrix configuration. Thus, the combination of Fish in view of Tarr and Anderson does not disclose or suggest each of the elements of amended claim 1. Applicant respectfully requests the Examiner withdraw the rejection of claims 1 and 23.

Because claims 2-11, 24 and 25 each depend from and further limit one of claim 1 or 23, claims 2-11, 24, and 25 are each patentable over Fish in view of Tarr and Anderson for at least the same reasons. Applicant respectfully requests the Examiner withdraw the rejection of claims 2-11, 24, and 25.

CONCLUSION

Applicant respectfully asserts that in view of the amendments and remarks above, all pending claims are allowable and Applicant respectfully requests the allowance of all claims.

Should the Examiner have any comments, questions, or suggestions of a nature necessary to expedite the prosecution of the application, or to place the case in condition for allowance, the Examiner is courteously requested to telephone the undersigned at the number listed below.

Respectfully submitted,



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Date: June 28, 2010

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